

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
(COLUMBIA DIVISION)

The South Carolina State Conference
Of the NAACP

_____,
Plaintiff/Petitioner/USA,

)
) Case No. 3:22-cv-01007-MGL
)

v.

Tonya Kohn;
Donald Beatty

_____,
Defendant/Respondent.

**Motion
in Support of
Pro Hac Vice Application**

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that **Laura Moraff** be admitted *pro hac vice* in the above-captioned case as associate counsel. As local counsel, I understand that:

1. I will personally sign and include my District of South Carolina federal bar attorney identification number on each pleading, motion, discovery procedure, or other document that I serve or file in this court; and
2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted *pro hac vice*; and
3. Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted *pro hac vice*; and
4. Unless excused by the court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.
5. Certification of Consultation (Local Civil Rule 7.02).

- ☒ Prior to filing this Motion, I conferred with opposing counsel who has indicated the following position as to this Motion: ☐ will likely oppose; ☒ does not intend to oppose
- ☐ Prior to filing this Motion, I attempted to confer with opposing counsel but was unable to do so for the following reason(s):
- _____

- ☐ No duty of consultation is required because the opposing party is proceeding pro se.

American Civil Liberties Union Foundation

Firm Name
125 Broad St., 18th Floor

Street Address or Post Office Box
New York, NY 10004

City, State, Zip Code
(212) 549-2500

Telephone Number
lmoraff@aclu.org

Allen Chaney

Name of Local Counsel

D. Allen Chaney Jr.

Signature of Local Counsel

Local Counsel for the Plaintiff

District of South Carolina

Federal Bar Number 13181